

Federal Defenders
OF NEW YORK, INC.

One Pierrepont Plaza-16th Floor, Brooklyn, NY 11201
Tel: (718) 330-1200 Fax: (718) 855-0760

David Patton
*Executive Director and
Attorney-in-Chief*

Deirdre D. von Dornum
*Attorney-in-Charge
Eastern District of New York*

August 11, 2022

By ECF and Email

The Honorable Allyne R. Ross
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Travis Lindsey, 22-CR-111 (ARR)

Your Honor:

I write on behalf of the defendant with the consent of the government to request an adjournment of the status conference currently scheduled for August 18, 2022. The parties are actively engaged in plea negotiations which we believe are likely to result in a disposition in advance of trial. Defense counsel recently submitted a mitigation package to the government to aid in its consideration of the appropriate offer. The parties request that the matter be adjourned for a status conference in approximately 45 days to a date convenient for the Court and the parties.

The parties move for a finding that the requested delay is excluded from speedy trial calculations pursuant to 18 U.S.C. §3161(h)(7)(A). the parties will notify the Court should they be able to reach a disposition in advance of the next scheduled conference.

I thank the Court in advance for its consideration of this request.

Sincerely,

/s/

Michelle Gelernt
Deputy Attorney-in-Charge
(718) 330-1204

cc: AUSA Gillian Kassner
Clerk of the Court via ECF